

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Ricardo Cancel Serrano
a/k/a Ricardo C. Serrano
a/k/a Ricardo Abdiel Cancel Rivera
a/k/a Ricardo Cancel
a/k/a Ricardo C. Serrano-Serrano

Debtor 1

Sheila Mari LaBoy
p/k/a Sheila Mari LaBoy Aguiar

Debtor 2

West York Borough
Movant(s)

v.

Ricardo Cancel Serrano
a/k/a Ricardo C. Serrano
a/k/a Ricardo Abdiel Cancel Rivera
a/k/a Ricardo Cancel
a/k/a Ricardo C. Serrano-Serrano
Sheila Mari LaBoy
p/k/a Sheila Mari LaBoy Aguiar

Respondent(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:17-BK-05157-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 36

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Ricardo Cancel Serrano and Sheila Mari LaBoy, through their attorney, Paul D.

Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)'

Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.

9. Admitted.
10. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
11. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 11; therefore, it is denied.
12. Admitted.
13. Admitted.
14. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 14; therefore, it is denied.

15. Paragraph 15 contains a conclusion of law to which no response is required.
16. Paragraph 16 contains a conclusion of law to which no response is required.
17. Paragraph 17 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: November 30, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, November 30, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Craig Sharnetzka, Esquire
CGA Law Firm
135 North George Street
York, PA 17401
Counsel for Movant(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire